

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JANSSEN SCIENCES IRELAND UNLIMITED	:	Civil Action No. 1:22-cv-01983 (BMC)
COMPANY, et al.,	:	
	:	<b>FILED <i>EX PARTE</i> AND UNDER SEAL</b>
Plaintiffs,	:	<b>PURSUANT TO 15 U.S.C. § 1116(d)</b>
	:	
v.	:	
	:	
SAFE CHAIN SOLUTIONS, LLC, et al.,	:	
	:	
Defendants.	:	
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**EXPEDITED DISCOVERY ORDER**

PLEASE TAKE NOTICE that upon the First Amended Complaint of Janssen Sciences Ireland Unlimited Company, Janssen Products, LP, and Johnson & Johnson (“Janssen” or “Plaintiffs”) and the memorandum of law submitted in support of this Order, and for good cause shown, it is hereby ORDERED:

1. Plaintiffs may immediately serve discovery requests on each Defendant.
2. Plaintiffs may immediately serve deposition notices or deposition subpoenas on any Defendant, or any individuals associated with Defendants, including but not limited to current or former pharmacists or employees.
3. Plaintiffs may immediately serve document subpoenas on any internet service provider, telephone or cellular service provider, and/or e-mail provider (including, but not limited to, Yahoo!, Google, and T-Mobile) reasonably believed to have provided services to Cina Pharmaceuticals, Inc. or Tronown V. Thomas, or any individuals or entities identified as being involved in the purchase, sale, distribution, or financing of Janssen-branded medication in materials seized from Cina Pharmaceuticals, Inc. and/or Tronown V. Thomas, or in materials received in response to subpoenas or other discovery requests. Such subpoenas shall be limited

to (a) information related to the purchase, sale, distribution, or financing of Janssen-branded medication, (b) information related to the identities of those with access to the accounts, and (c) information related to efforts by anyone to destroy or conceal information in the accounts.

4. Plaintiffs may immediately serve document subpoenas on any individuals or entities identified as being involved in the purchase, sale, distribution, or financing of Janssen-branded medication in materials seized from Defendants Cina Pharmaceuticals, Inc. and/or Tronown V. Thomas, or in materials received in response to subpoenas or other discovery requests. Such subpoenas shall be limited to information related to the purchase, sale, distribution, or financing of Janssen-branded medication.

5. Plaintiffs may immediately serve document subpoenas on any financial institution where any Defendant, or any individuals or entities identified as being involved in the purchase, sale, distribution, or financing of Janssen medication in materials seized from Defendants Cina Pharmaceuticals, Inc. and/or Tronown V. Thomas, or in materials received in response to subpoenas, are reasonably believed to hold accounts or signatory authority over accounts. Such subpoenas shall be limited to records related to such accounts.

6. The discovery described in paragraphs 1 through 5 shall proceed on an expedited basis without the need to comply with the time limits of the Federal Rules of Civil Procedure and responses must be provided (or witnesses must be made available for deposition) within seven (7) calendar days.

7. Pursuant to **Federal Rule of Civil Procedure 26(d)(1)**, and as previously ordered by the Court, all parties may conduct third-party discovery. Except as provided in paragraphs 1-5 above, the timing and scope of third-party discovery shall be governed by the Federal Rules of Civil Procedure.

8. As previously ordered by the Court, in taking third-party discovery, Plaintiffs need not comply with the notice requirements of Federal Rule of Civil Procedure 45(a)(4).

Digitally signed by  
Brian M. Cogan

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UNITED STATES DISTRICT JUDGE

Issued: July\_\_29\_\_, 2022 at \_10:44'clock \_a.m.\_